IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF TENNESSEE

IN RE:	
Owen Carl Bell))
Debtor) Case No. 16-029966-CW3-7) Chapter 7
John C. McLemore, Trustee) Judge Charles M. Walker
Plaintiff,) Adv. Proc. No. 3:17-ap-90040
v.	 On Appeal to the U.S. District Court Case No. 3:18-cv-00501 Chief Justice Crenshaw
Owen Carl Bell 4099 Brick Church Pike Whites Creek, TN 37189))))
and	Motion, DE11, is GRANTED,
Marla Sue Bell 4099 Brick Church Pike Whites Creek, TN 37189	Salsona D. Colhes
and	
The Owen Bell Family Limited Partnership)))
c/o Marla Bell 4099 Brick Church Pike)
Whites Creek, TN 37189)
Defendants.)

APPELLANTS' MOTION TO FOR ADDITIONAL TIME TO FILE BRIEF

Comes now the Appellants, Owen Carl Bell, Marla Sue Bell, and the Owen Bell Family Limited Partnership (hereinafter "Appellants"), by and through counsel, and respectfully file this Motion for Additional Time pursuant to Bankruptcy Rule 8018(a) which allows for the Court to extend the briefing schedule. Appellants request a two-week extension to file their Appellate Brief

with this Court. Counsel for Appellants has requested an extension from counsel for Appellees. Counsel for Appellee responded they did not object but wanted something in return, which the Appellants have yet to be able to agree to. Therefore, the Appellee has yet to agree to the two-week extension.

This is the Appellants first request for an extension. This counsel will be on a family vacation at the time the brief is due, which July 23, 2018. Additionally, this counsel has an appellate brief due in another matter the following day, July 24, 20178 which this Counsel is currently working on. For the reasons stated, the Appellants request a two-week extension to file the Appellate Brief with the Court with a new deadline of August 6, 2018.

Respectfully Submitted,

/s/ Mark T. Freeman
Mark T. Freeman, Esq. (BPR #16098)
FREEMAN AND FUSON
2126 21st Avenue South
Nashville, TN 37212
Phone (615) 298-7272
Fax (615) 298-7274
mark@freemanfuson.com
Attorney for Appellants

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following parties via the Court's CM/ECF system, or by United States mail, postage prepaid, this 17th day of July, 2018:

William J. Harbison II, Esq.
Neal & Harwell, PLC.
1201 Demonbreun St. Ste. 1000
Nashville, TN 37203
jharbison@nealharwell.com
Attorney for Trustee John C. McLemore

Margaret Leslie Curry Bay Law Firm of Leslie Curry Bay PLLC 2000 Richard Jones Rd. Ste. 250 Nashville, TN 37215 leslie@currybaylaw.com

<u>/s/ Mark T. Freeman</u> Mark T. Freeman, Esq.